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Attorneys for Defendant The Hotel Corporation of the Bahamas d/b/a Radisson Cable Beach Gold and Casino Resort

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOAN SPANO and EDWARD SPANO,

PLAINTIFFS,

v.

THE MYERS GROUP, THE HOTEL
CORPORATION OF THE BAHAMAS d/b/a
RADISOON CABLE BEACH GOLF AND
CASINO RESORT, RADISSON HOTEL
CORPORATION, RADISSON HOTELS
INTERNATIONAL, INC., CARLSON
HOSPITALITY GROUP, INC., CARLSON
COMPANIES, INC. and CARLSON HOLDINGS,
INC.,

Defendants.

: Case No. 05-6039 (AET)

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Civil Action

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NOTICE OF MOTION

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VIA ELECTRONIC FILING

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TO: Charles I. Richman, Esq.
2250 Chapel Avenue West, Second Floor
Cherry Hill, New Jersey 08022

SIR:

PLEASE TAKE NOTICE, that on **Friday, March 2, 2009** at **9:00 o'clock** in the forenoon or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendant The Hotel Corporation of the Bahamas d/b/a Radisson Cable Beach Gold and Casino Resort, shall move pursuant to Local Civil Rule 7.1 before the United States District Court, District of New Jersey, for an Order vacating the Default Judgment entered against it and in favor of

Plaintiffs Joan Spano and Edward Spano, and finding that this Court does not have personal jurisdiction over Defendants.

In support of the within application, reliance shall be placed upon the annexed Brief in Support of Motion, and Affidavit of Sir Baltron Bethel.

A proposed form of Order is attached hereto pursuant to Local Civil Rule 7.1(e).

WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP
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Cable Beach Gold and Casino Resort

By: /s/ Thomas F. Quinn
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Dated: February 13, 2009